

O:Honorable Alvin K. Hellerstein COMPANY:

WILLIAM L. JUSKA, JR.  
JAMES L. ROSS\*  
ERIC E. LENCK  
JOHN J. WALSH\*  
PATRICK J. BONNER\*  
PETER J. GUTOWSKI  
MARK F. MULLER  
WAYNE D. MEEHAN\*  
DON P. MURNANE, JR.\*  
THOMAS M. RUSSO  
THOMAS M. CANEVARI\*  
MICHAEL FERNANDEZ\*  
JOHN F. KARPOUSIS\*  
MICHAEL E. UNGER\*  
WILLIAM J. PALLAS\*  
GINA M. VENEZIA\*  
JUSTIN T. NASTRO\*  
MANUEL A. MOLINA  
DANIEL J. FITZGERALD\*  
BARBARA G. CARNEVALE  
JAN P. GISHOLT\*  
SUSAN LEE\*  
ERIC J. MATHESON\*  
MICHAEL D. TUCKER\*

\* ALSO ADMITTED IN NEW JERSEY  
\* ALSO ADMITTED IN CONNECTICUT  
\* ALSO ADMITTED IN WASHINGTON, D.C.  
\* ALSO ADMITTED IN LOUISIANA

LAW OFFICES OF  
**FREEHILL HOGAN & MAHAR LLP**  
80 PINE STREET  
NEW YORK, N.Y. 10005-1759

TELEPHONE (212) 425-1900

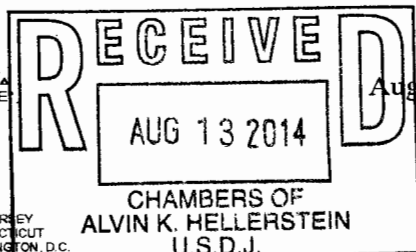
FACSIMILE (212) 425-1901

E-MAIL: reception@freehill.com

www.freehill.com

NEW JERSEY OFFICE  
549 SUMMIT AVENUE  
JERSEY CITY, N.J. 07306-2701  
TELEPHONE (973) 623-5514  
FACSIMILE (973) 623-3813

CONNECTICUT OFFICE  
215 W. MERIDEN AVENUE  
STRATFORD, CT 06615  
TELEPHONE (203) 821-1913  
FACSIMILE (203) 358-8377



August 13, 2014

USDC SENT  
DOCUMENT  
ELECTRONICALLY FILED  
DCC #:  
DATE FILED: 8/14/14  
OF COUNSEL  
GEORGE B. FREEHILL

Our ref: 592-08/WDM/GMV

Via Telefax: (212) 805-7942

The Honorable Alvin K. Hellerstein  
500 Pearl Street, Room 910  
New York, New York 10007

Re: In re M/V APL PERU  
08-cv-9352 (AKH)  
09-cv-2549 (AKH)  
09-cv-4081 (AKH)  
09-cv-8054 (AKH)  
09-cv-8457 (AKH)  
09-cv-8639 (AKH)  
10-cv-2255 (AKH)  
10-cv-4253 (AKH)  
10-cv-6107 (AKH)  
10-cv-6108 (AKH)

*One last adjournment  
is granted, to Sep 19,  
2014, 10<sup>00</sup> a.m.  
8-13-14  
[Signature]*

Dear Judge Hellerstein:

We represent the vessel owner and vessel manager ("Owners/Managers") in the captioned litigation, and also serve as Liaison Counsel for the Defending Parties. We are writing to provide the Court with an update on the settlement.

We had previously advised the Court that we circulated a draft settlement agreement and solicited comments and suggested changes from the various parties to the agreement. We have now worked through the parties' comments/concerns about the terms of the agreement, and we have today circulated what we anticipate to be the final draft. Once the agreement has been signed by all parties, we intend to submit a stipulation discontinuing the consolidated actions.

O:Honorable Alvin K. Hellerstein COMPANY:

August 13, 2014  
Page 2 of 3

Under the circumstances, we respectfully request that the conference scheduled for this Friday, August 15, 2014, be adjourned, pending the filing of the Stipulation of Discontinuance.

We thank the Court for its consideration.

Respectfully submitted,  
FREEHILL HOGAN & MAHAR, LLP



Wayne D. Meehan  
Gina M. Venezia

WDM/mc

cc: All counsel via email

**Counsel for Plaintiff Cargo Interests:**

[wrcannon@MDWCO.com](mailto:wrcannon@MDWCO.com); [linativ@MDWCO.com](mailto:linativ@MDWCO.com); [coradrik@MDWCO.com](mailto:coradrik@MDWCO.com);  
[mfc@caseybarnett.com](mailto:mfc@caseybarnett.com); [cms@caseybarnett.com](mailto:cms@caseybarnett.com);  
[jwacnev@niccolilhornig.com](mailto:jwacnev@niccolilhornig.com); [scoluzzi@niccolilhornig.com](mailto:scoluzzi@niccolilhornig.com);  
[reichler@niccolilhornig.com](mailto:reichler@niccolilhornig.com);  
[lkranzlis@badakwill.com](mailto:lkranzlis@badakwill.com);  
[cmaleigh@cozen.com](mailto:cmaleigh@cozen.com); [dlob@cozen.com](mailto:dlob@cozen.com);

**Counsel for NVO's:**

[atkinson@mariva.com](mailto:atkinson@mariva.com);  
[hugasso@aol.com](mailto:hugasso@aol.com);  
[jhal@att.net](mailto:jhal@att.net)

**Counsel for Vessel Owners:**

[venezia@freehill.com](mailto:venezia@freehill.com); [meehan@freehill.com](mailto:meehan@freehill.com)

**Counsel for APL:**

[jkinball@blankrome.com](mailto:jkinball@blankrome.com); [LWiggins@BlankRome.com](mailto:LWiggins@BlankRome.com); [AWeigel@BlankRome.com](mailto:AWeigel@BlankRome.com)

**Counsel for MOL:**

[jmcera@mcclaugbinstern.com](mailto:jmcera@mcclaugbinstern.com)

**Counsel for Hyundai:**

[donatelli@ckvt.com](mailto:donatelli@ckvt.com); [evengrow@ckvt.com](mailto:evengrow@ckvt.com)

O:Honorable Alvin K. Hellerstein COMPANY:

August 13, 2014

Page 3 of 3

Counsel for Spectrum:

[JNawalka@hillrivkins.com](mailto:JNawalka@hillrivkins.com); [RPlayden@hillrivkins.com](mailto:RPlayden@hillrivkins.com); [heisenbrower@hillrivkins.com](mailto:heisenbrower@hillrivkins.com)

Counsel for BYD:

[hprieto@cardillocorbett.com](mailto:hprieto@cardillocorbett.com)

Counsel for Quantum:

[pil@mqpllegal.com](mailto:pil@mqpllegal.com); [serm@mqpllegal.com](mailto:serm@mqpllegal.com)

Counsel for GPI:

[frimweger@hillbetts.com](mailto:frimweger@hillbetts.com); [bjarnas@hillbetts.com](mailto:bjarnas@hillbetts.com)

Counsel for Desay:

[Lawrence.brennan@wilsonsiber.com](mailto:Lawrence.brennan@wilsonsiber.com)